

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MAINE

U.S. DISTRICT COURT
PORTLAND, MAINE
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JEAN LaROCQUE, by and through her)
appointed Power of Attorney, DEIDRE)
SPANG, on behalf of herself and all others)
similarly situated,)

Civil Action No. 13-2726
DEPUTY CLERK

Plaintiff,)

v.)

TRS RECOVERY SERVICES, INC.)

Defendants.)

**OBJECTION OF PATRICK S. SWEENEY TO PROPOSED SETTLEMENT AND
NOTICE OF INTENT TO APPEAR**

NOW COMES, Pro Se Objector PATRICK S. SWEENEY, hereby files these
objections to the proposed settlement in this matter.

PROOF OF MEMBERSHIP IN CLASS

Upon information and belief Patrick S. Sweeney, Pro Se ("Objector") has reviewed
the Notice of Class Action Settlement and as a result believes that he is a member of the class
as defined in that certain Notice of Class Action Settlement which is undated but is posted on
the class action's website. He has timely file a claim. His address and telephone number are
listed at the conclusion of this objection.

NOTICE OF INTENT TO APPEAR

Objector hereby gives notice that he does not intend to appear at the Fairness Hearing
presently scheduled for January 21, 2016, at 10:00 a.m. EST before Honorable Judge Hornby

at the United States Courthouse for the District of Maine, 156 Federal Street, Portland, Maine 04101.

I.

Reason for Objecting to Settlement:

For the following reasons, inter alia, the Settlement Agreement is not fair, reasonable and adequate.

1. Claims administration process fails to require reliable oversight, accountability, and reporting about whether the claims process actually delivers what was promised.
2. Timeframes and deadlines benefit Defendants and Class Counsel, but not Class Members; No timeframe for completing administration of the Monetary Relief is set, so Class Members cannot know when payment would arrive.
3. No amount of attorney fees is to be withheld to assure Class Counsel's continuing oversight and involvement in implementing settlement.
4. Attorney fees do not depend upon how much relief is actually paid to the Class Members.
5. The fee calculation is unfair in that the percentage of the settlement amount is far too high.
- 6.
7. Any fee awarded prior to knowing the amount of relief actually paid to Class Members must be limited to lodestar calculation.
8. Fee request is not reasonable in the absence of documentation, including billing records, which can be evaluated by Class Members and the Court.
9. Attorneys' fees are disproportionate to the value of the Recovery of the Class. The Settlement Fund is \$3,340,000 but only \$2,045,000 will be distributed to the Class Members. Thus \$1,035 of \$2,045,000 is actually 50.65 % of the amount available for distribution to the Class Members.
10. Notice is inadequate in that no alleged violated statutes are referenced, no briefing schedule is included and that an objector's only remedy is to write a letter setting forth objections.

The Objector herein hereby adopts and joins in all other objections which are based on sufficient precedent and theories of equity and law in this case and hereby incorporates said objections by reference as if they were fully described herein.

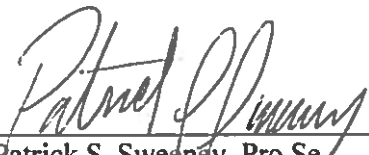
II.

CONCLUSION

WHEREFORE, This Objector, for the foregoing reasons, respectfully requests that the Court, upon proper hearing:

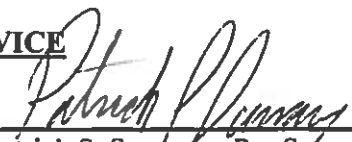
1. Sustain these Objections;
2. Enter such Orders as are necessary and just to adjudicate these Objections and to alleviate the inherent unfairness, inadequacies and unreasonableness of the proposed settlement.
3. Award an incentive fee to this Objector for her role in improving the Settlement, if applicable.

Dated: December 22, 2015

By: 
Patrick S. Sweeney, Pro Se
2590 Richardson Street
Madison, WI 53711
Telephone: (310)-339-0548
Facsimile: (561)395-9093
Email:patrickshanesweeney@gmail.com

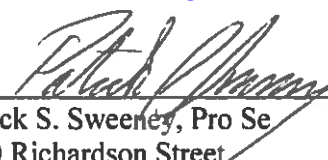
CERTIFICATE OF SERVICE

Dated: December 22, 2015,

By: 
Patrick S. Sweeney, Pro Se
2590 Richardson Street
Madison, WI 53711
Telephone: (310)-339-0548
Facsimile: (561)395-9093
Email:patrickshanesweeney@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2015, I filed the foregoing with the Clerk of the Court of the United States District Court for the District of Maine and to Class Counsel and Defense Counsel at the addresses set forth below via U.S. First Class Mail.

By: 
Patrick S. Sweeney, Pro Se
2590 Richardson Street
Madison, WI 53711

Clerk of Courts
United States District Court
District of Florida
156 Federal Street
Portland, Maine 04101

Class Counsel:
Francis & Mailman, P.C.
100 Broad Street
19th Floor
Philadelphia PA 19110

Defense Counsel:
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